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Attorneys for Defendant and Counterclaimant

Skyryse, Inc.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MOOG INC.,

Plaintiff,

v

SKYRYSE, INC., ROBERT ALIN
PILKINGTON, MISOOK KIM, and
DOES NOS. 1-50,

Defendants.

SKYRYSE, INC.,

Counterclaimant,

v

MOOG INC.,

Counterclaim-Defendant.

CASE NO. 2:22-cv-09094-GW-MAR

**DECLARATION OF KELLEY
STOREY IN SUPPORT OF JOINT
STIPULATION RE: DEFENDANTS'
MOTION TO ENFORCE ORDER
COMPELLING TRADE SECRET
IDENTIFICATION**

Discovery Cut-Off: April 12, 2024
Pre-Trial Conference: August 12, 2024;
8:30 a.m.

Trial: August 27, 2024

Hearing: May 31, 2023

Time: 11:00 a.m.

Judge: Hon. Margo A. Rocconi

Location: Courtroom 790, 7th Floor

1 I, Kelley Storey, hereby declare and state as follows:

2 1. I am an attorney at Latham & Watkins LLP, counsel of record for the
3 Defendant and Counterclaimant Skyrise, Inc. in the above-titled action. I am over
4 the age of 18 years old. I have personal knowledge of the matters set forth herein
5 and if called as a witness, I could and would competently testify to all facts set forth
6 herein. I provide this declaration in support of Skyrise's Portions of the Joint
7 Stipulation re: Defendants' Motion to Enforce Order Compelling Trade Secret
8 Identification.

9 2. Attached hereto as exhibit A is a true and correct copy of a letter dated
10 June 27, 2022 from Doug Lumish to Rena Andoh.

11 3. Attached hereto as Exhibit B is a true and correct copy of excerpts of
12 the July 15, 2022 Hearing transcript.

13 4. Attached hereto as Exhibit C is a true and correct copy of excerpts of
14 the July 27, 2022 Hearing transcript.

15 5. Attached hereto as Exhibit D is a true and correct copy of the document
16 titled "Moog's Trade Secret ID (CUI)" with Exhibits 1 and 2 served by Moog on
17 February 1, 2023.

18 6. Attached hereto as Exhibit E is a true and correct copy of the document
19 titled "Moog's Trade Secret ID (Non-CUI)" with Exhibit A served by Moog on
20 February 1, 2023.

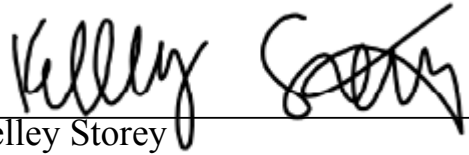
21 7. Attached hereto as Exhibit F is a true and correct copy of a letter dated
22 March 24, 2023 from Kazim Naqvi to Douglas Lumish, Gabriel Gross, Joseph Lee,
23 Cassandra Baloga, Kelley Storey, Julianne Osborne, Arman Zahoory, and Ryan
24 Bans.

25 8. Attached hereto as Exhibit G is a true and correct copy of the April 19,
26 2023 Scheduling Order.

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1 I declare under penalty of perjury that the foregoing is true and correct and
2 that this declaration was executed on May 9, 2023 in Washington, District of
3 Columbia.

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7 _____
8 Kelley Storey
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